

HONORABLE RONALD LEIGHTON

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

JANE ROE 1 AND JANE ROE 2 on behalf of
themselves and on behalf of other similarly
situated individuals, and DREAMGIRLS OF
TACOMA, LLC, a Washington Limited
Liability Corporation,

Plaintiffs,

v.

JULIE ANDERSON, Pierce County Auditor,
PIERCE COUNTY, a county in the State of
Washington, and DAVID VAN VLEET, an
individual

Defendants.

DECLARATION OF JANE DOE

14-CV-5810-RBL

JANE DOE declares and certifies as follows:

1. I am over 18 years old, and I am competent to be a witness. I have personal knowledge of the facts laid out below.
2. I read an article online about the above-captioned case and contacted counsel for the Plaintiffs because I want this Court to know that the dangers cited by the Plaintiffs are real.
3. I am a former exotic dancer. I worked at a nightclub in Seattle, Washington.
4. While I was working as a dancer, I used a stage name in order to conceal my true identity from clients. I did not want the information that I was an exotic dancer to become public,

1 and I did not want to be contacted by clients outside of the work environment. Because of
2 the nature of my work, I did not think that it would be safe to allow clients to contact me
3 when I was not at the nightclub, where I was protected by bouncers and other employees.

4 5. In 2009, while I was working as a dancer, a client of mine made a public records request
5 and obtained a copy of my license. In addition to my stage name and the address of the
6 club in which I worked, this license revealed my legal name, personal telephone number,
7 and home address. This client then began contacting me. He first contacted me on
8 October 9, 2009, via a friend request on Facebook. I posted to an exotic dancing message
9 board online and asked other dancers how this client could know my full name, and
10 asking advice. The other women advised me to ignore the request, which I did. The next
11 contact from this client was via text message to my personal mobile phone, three days
12 later. I continued to receive texts from him in the following days, at which point, I
13 decided to respond and ask him how he had obtained my information. He eventually
14 revealed that he had requested my license information using only my stage name. I
15 continued to receive texts, phone calls, and emails from this client for over a year, despite
16 my requests that he stop contacting me.

17 6. Having a client make repeated contact with me outside of work was extremely unsettling.
18 I did not know initially how he had acquired my information – I was confident that I had
19 not revealed any identifying information to him. I do not use drugs or even drink alcohol;
20 I knew that he did not get my information from me. I have always been extremely
21 protective of my personal details while working in the adult industry. I went as far as to
22 provide false hometowns, college names, and so on when clients were persistent in
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1 hearing about my life. The only way I could imagine that the client could have obtained
2 my information was through an employee at the club, but I had not given my full name to
3 any of the dancers, bouncers, or waitresses. This made me feel suspicious of the club
4 management; I felt vulnerable even to those who were employed to protect me. I was
5 nervous on my commute to and from work, I felt afraid when I was home alone, and I
6 was distrustful of people with whom I interacted daily. In the end, the client did not
7 escalate to physical violence or in-person stalking, but the situation was upsetting and
8 scary.

- 9 7. When I learned that it was not my co-workers or an acquaintance that had revealed my
10 personal information, but rather, the city of Seattle, I felt even more violated. As soon as I
11 learned the method the client had used to find my contact information, I went to the city's
12 website and tried searching for my stage name in the online license database. When it
13 immediately revealed my name, phone number, and address, I truly felt more exposed
14 than I felt on stage as an exotic dancer. When dancing, the interaction is two-way, and I
15 am aware of what the client is seeing. I have some sense of control over the situation.
16 With the public release of my information available to the world, I didn't just feel
17 exposed; I felt violated and vulnerable. I looked up the names of some of my fellow
18 dancers, and found them all with ease. I had no idea if other clients had looked up my
19 information, were driving past my house, or looking at my Facebook photos. I closed
20 down my Facebook account privacy settings, so it would not be possible to find me in
21 searches. This setting is still active; I'm still uncomfortable with the idea of a stranger
22 identifying me so easily. I wish now that I had confronted the city about this issue, but I
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1 did not feel that I had any power in the situation. I chose not to renew my license after I
2 stopped dancing in 2010. I did not want my information to continue to be available, or
3 show up in search engine results when friends, family, or employers casually searched
4 my name.

- 5 8. I want to remain anonymous now because I have moved on from working in the adult
6 entertainment industry, have a different job in a different field, and don't want to be
7 outed as a former dancer to my employer, friends, and family. I also do not want my
8 former client or any other individual to harass me if they read about me participating in
9 this lawsuit.

10
11 I declare under penalty of perjury of the laws of the United States that the foregoing is
12 true and correct to the best of my knowledge.

13
14 Dated: October 22, 2014

15
16 /s/ Jane Doe

17 Jane Doe

18 *(Actual signature to be retained in files of counsel for Plaintiffs.)*

CERTIFICATE OF SERVICE

I certify that on October 22, 2014, I caused to be electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the attorney(s) of record.

/s/Gilbert H. Levy

Gilbert H. Levy WSBA# 4805

Attorney for Plaintiffs